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Co-counsel for Plaintiff, RSL Communications Plc

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RSL COMMUNICATIONS PLC, by Michael John
Andrew Jarvis and Steven Anthony Pearson, as the
Joint Administrators,

Plaintiff,

-against-

NESIM BILDIRICI, PAUL DOMORSKI,
ITZHAK FISHER, RONALD S. LAUDER,
STEVEN SCHIFFMAN, JACOB SCHUSTER and
EUGENE SEKULOW,

Defendants.

04 Civ. 5217 (RJS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Motion of RSL Communications Plc to Supplement Discovery; the Declaration of John H. Bae in Support of Motion of RSL Communications Plc to Supplement Discovery, dated May 29, 2009, and

accompanying exhibits; and all pleadings herein; plaintiff RSL Communications Plc (“RSL Plc”), by Steven Anthony Pearson and Michael John Andrew Jervis as joint administrators, and by its undersigned attorneys, hereby moves for an Order pursuant to Federal Rule of Civil Procedure 56(f) allowing RSL Plc to supplement the record in this case with additional discovery. Oral argument will be held on a date and at a time designated by the Court.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order of this Court dated May 15, 2009, defendants’ opposition papers are due on June 12, 2009, and plaintiff’s reply, if any, is due on June 19, 2009.

Dated: New York, New York
May 29, 2009

Respectfully submitted,

/s/ John H. Bae

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